

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

United States of America,

Plaintiff,

Case No. 18-cv-11307

vs.

Honorable: Victoria A. Roberts

Nineteen Thousand Three Hundred
Fifteen Dollars and Eighteen Cents
(\$19,315.18) in U.S. Currency
from Bank of America Account
Number: 237033591854

Defendant *In Rem.*

**STIPULATION FOR ENTRY OF ORDER STAYING
PROCEEDING FOR A PERIOD OF 90 DAYS**

NOW COMES the Plaintiff, the United States of America, by and through Matthew Schneider, United States Attorney, and Philip A. Ross, Assistant United States Attorney, and Claimant, E.L. Mann, Inc., by and through its attorney, John D. Dakmak, Esq., hereby acknowledge that there is an ongoing criminal investigation related to the above-captioned civil forfeiture case, and stipulate as follows:

IT IS HEREBY STIPULATED AND AGREED that this civil forfeiture case be stayed for a period of 90 days pursuant to 18 U.S.C. § 981(g)(1), or alternatively, 18 U.S.C. § 981(g)(2), on the grounds that continuation of the civil

proceeding may negatively impact one or all parties in the manner described in the cited statutes; that the stay continue during the pendency of the investigation and criminal proceedings, if any, or until further order of the Court without prejudice to any of the parties to seek an advance termination or an extension of the stay;

IT IS FURTHER STIPULATED AND AGREED that the parties shall have a reasonable time to conduct discovery, file dispositive motions, and file all witness lists prior to any pretrial or trial proceedings. No claims or defenses are waived as a result of the stay.

IT IS FURTHER STIPULATED AND AGREED that upon termination of the stay, the Court will set a scheduling conference.

Approved as to substance and form:

Respectfully submitted,

Matthew Schneider
United States Attorney

s/Philip A. Ross
Philip A. Ross
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s/John D. Dakmak (with consent)
John D. Dakmak
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(P58210)

Dated: June 14, 2018

Dated: June 14, 2018

IT IS SO ORDERED:

S/Victoria A. Roberts
Victoria A. Roberts
United States District Judge

Dated: June 15, 2018